## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

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J. BARRETT

U.S. DISTRICT COURT UNITED STATES OF AMERICA, CASE NO.

> Plaintiff, INDICTMENT

v.

Charles Edward ODEN(1) 18 U.S.C. § 2

aka "Charles Edward ODUM", 21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(vi)(viii) Anthony Tyrone PHILLIPS(2) aka "Tank", 21 U.S.C. § 841(b)(1)(B)(vi)(viii)

Enya KIRKSEY(3), 21 U.S.C. § 841(b)(1)(C)

Jan C. MURRELL(4), 21 U.S.C. § 846

Laquintee Deshon BLOODWORTH(5), 21 U.S.C. § 856(a)(2)

18 U.S.C. § 922(g)(1) Roderick Eric HENRY(6), 18 U.S.C. § 924(a)(2) Roy JACKSON(7)

aka "Unk", 18 U.S.C. § 924(d) 28 U.S.C. § 2461(c) Cesar DIAZ-Gomez(8),

21 U.S.C. § 853(a) Carl BERRY(9),

James CARTER(10), **Gregory MOORE(11)** 

aka "Gregory CAMPBELL",

Michael STALLWORTH(12), and

Savalas MILLS(13).

Defendants.

**Notice of Forfeiture** 

#### THE GRAND JURY CHARGES THAT:

### **COUNT ONE** (NARCOTICS CONSPIRACY)

### A. THE CONSPIRACY

From on or about August 1, 2017, and continuing thereafter until September 17, 2018, within the Southern District of Ohio, and elsewhere, the defendants, Charles Edward ODEN, aka "Charles Edward ODUM"; Anthony Tyrone PHILLIPS, aka "Tank"; Enya KIRKSEY; Jan C. MURRELL; Laquintee Deshon BLOODWORTH; Roderick Eric HENRY; Roy JACKSON, aka :Unk"; Cesar DIAZ-Gomez; Carl BERRY; James CARTER; Gregory MOORE, aka "Gregory CAMPBELL"; Michael STALLWORTH and Savalas MILLS did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other and with others, to possess with intent to distribute and to distribute 400 grams or more of mixtures or substances containing detectable amounts of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (hereinafter "fentanyl" at all times in this Indictment), a Schedule II Controlled Substance, and 500 grams or more of mixtures or substances containing detectable amounts of methamphetamine, a Schedule II Controlled Substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(vi),(viii), (B)(vi),(viii) and (C).

### **B. GOAL OF THE CONSPIRACY**

It was a goal of the conspiracy that, in order to obtain as much money and other things of value as possible, the defendant and co-conspirators acquired fentanyl mixtures, methamphetamine, cocaine, and other controlled substances, for the purpose of distributing them in the Southern District of Ohio and obtaining money and other things of value. At all times in this Indictment, the term "fentanyl" refers to the Schedule II Controlled Substance illegally possessed, obtained and distributed, "heroin" refers to the Schedule I Controlled Substance illegally possessed, obtained and distributed, "cocaine" refers to the Schedule II Controlled Substance illegally possessed, obtained and distributed, and "methamphetamine" refers to the Schedule II Controlled Substance illegally possessed, obtained and distributed, and "methamphetamine" refers to the Schedule II

### C. WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY

The ways, manner and means by which the co-conspirators operated their illegal drug trafficking organization, include, *but are not limited to* the following:

It was part of the conspiracy that the defendant and co-conspirators used cellular telephones to facilitate their illegal drug business.

It was further part of the conspiracy that fentanyl and heroin were brought into the Southern District of Ohio where they were further processed, cut, packaged, and stored prior to distribution to members of the conspiracy and/or customers, in safe locations, known as stash houses, located in the Southern District of Ohio. The defendant and others used stash houses to store fentanyl, heroin and fentanyl/heroin mixtures, methamphetamine mixtures, narcotics-processing and packaging materials, and monies obtained through the illegal sale of controlled substances, primarily heroin/fentanyl mixtures, in order to avoid detection.

## D. OVERT ACTS

In furtherance of the conspiracy and in order to accomplish its objectives, the defendants, Charles Edward ODEN, aka "Charles Edward ODUM"; Anthony Tyrone PHILLIPS, aka "Tank"; Enya KIRKSEY; Jan C. MURRELL; Laquintee Deshon BLOODWORTH; Roderick Eric HENRY; Roy JACKSON, aka Unk"; Cesar DIAZ-Gomez; Carl BERRY; James CARTER; Gregory MOORE, aka "Gregory CAMPBELL"; Michael STALLWORTH and Savalas MILLS committed, among others, the following (each, as involved in the DTO with Charles Edward ODEN, aka "Charles Edward ODUM"):

- On August 1, 2017, BLOODWORTH traveled to Cincinnati, Ohio, from Los Angeles, California.
- 2. On September 6, 2017, BLOODWORTH traveled to Cincinnati, Ohio, from Los Angeles, California.
- 3. On May 18, 2018, PHILLIPS was arrested and found to be in possession of approximately 1,948 grams of cocaine and 7 grams of fentanyl.
- On August 24, 2018, BLOODWORTH traveled to Cincinnati, Ohio, from Los Angeles,
   California.

- 5. On September 6, 2018, HENRY traveled to Cincinnati, Ohio from Los Angeles, California.
- 6. On September 10, 2018, ODEN and MOORE discussed the distribution of heroin/fentanyl. ODEN informed MOORE that ODEN would be delivering additional heroin/fentanyl to MOORE and that ODEN still had "three" in his possession, referring to three kilograms of heroin/fentanyl.
- 7. On September 10, 2018, MILLS told ODEN that MILLS needed "ice" for his "tea," referring to methamphetamines.
- 8. On September 11, 2018, STALLWORTH and ODEN discussed the distribution of controlled substances.
- 9. On September 11, 2018, ODEN told JACKSON to meet at the "clubhouse", a term for 1407 Beaverton Avenue. Prior to this call, ODEN spoke with another person about ODEN having "Unc,"deliver a "whole joint," referring to JACKSON delivering a kilogram of controlled substances.
- 10. On September 11, 2018, ODEN told MOORE that he was going to send MOORE [heroin/fentanyl] and ODEN and MOORE discussed the price of a kilogram of [heroin/fentanyl] as \$48,000.
- 11. On September 11, 2018, in a subsequent telephone call, ODEN later informed MOORE that the price would be \$1,800 per ounce.
- 12. On September 11, 2018, KIRKSEY discussed getting controlled substances from ODEN for another person.
- 13. On September 12, 2018, PHILLIPS ordered controlled substances from ODEN.
- 14. September 12, 2018, ODEN asked JACKSON where he was, and JACKSON told ODEN that he (JACKSON) is on Tennessee [Avenue]. During a subsequent call, ODEN told Gregory MOORE that "he's on his way," referring to JACKSON delivering controlled substances to

### MOORE.

- 15. On September 12, 2018, at approximately 1:40 p.m., Anthony PHILLIPS and ODEN discussed JACKSON mistakenly mixing up the deliveries of controlled substances to PHILLIPS and MOORE. At approximately 1:59 p.m., ODEN called JACKSON and told him that JACKSON "did that shit backwards" and that he needed to "go back and and switch it around," referring to the mixup in JACKSON's mix-up during the previous delivery of controlled substances to MOORE and PHILLIPS.
- 16. On September 12, 2018 at approximately 3:07 p.m., ODEN asks JACKSON if it was "straight," referring to JACKSON fixing the mix-up in deliveries of controlled substances to MOORE and PHILLIPS.
- 17. On September 12, 2018, at approximately 8:09 p.m., ODEN spoke with MURRELL and asked MURRELL if MURRELL's customer wanted a "whole one". MURRELL asked ODEN what kind of phone ODEN was using (indicating his reservation at talking about narcotics trafficking openly over the phone).
- 18. On September 12, 2018, at approximately 8:11 p.m., MURRELL asked ODEN if there would be a price break for the purchase of two kilograms and ODEN responded there would not.
- 19. On September 12, 2018, at approximately 8:42 p.m., ODEN tells JACKSON that ODEN needs JACKSON at the "clubhouse" [to deliver controlled substances for MURRELL].
- 20. On September 13, 2018, STALLWORTH informed ODEN that he would pay ODEN approximately \$9,000 to \$10,000 for the purchase of cocaine.
- 21. On September 13, 2018, MILLS ordered additional illegal narcotics from ODEN.
- 22. On September 13, 2018, BLOODWORTH distributed approximately one kilogram of heroin/fentanyl to ODEN.

- 23. On September 13, 2018, KIRKSEY supplied \$45,000 to BLOODWORTH for the purchase of the kilogram of heroin/fentanyl.
- 24. On September 13, 2018, MURRELL received the kilogram of heroin/fentanyl.
- 25. On September 13, 2018, BERRY requested approximately six ounces of cocaine from ODEN, for the price of \$1,200 apiece.
- 26. On September 13, 2018, ODEN and CARTER discussed the quality of the controlled substances that CARTER previously purchased from ODEN. CARTER indicated that he had a "whole one" and offered to give a "zip" to ODEN to see what ODEN's customers thought of the quality. JACKSON, at the direction of ODEN, met with and transferred money and/or drugs to CARTER.
- On September 13, 2018, ODEN tells CARTER that ODEN needs "the other one" and that ODEN was short "like five grams," referring to five grams missing from the last quantity of controlled substances ODEN got from CARTER. ODEN later asked CARTER for "nine" [ounces of controlled substances].
- 28. On September 13, 2018 ODEN told JACKSON to tell another person that ODEN has two single "O's" for him, referring to ODEN having two ounces of controlled substances for that other person.
- 29. On September 14, 2018, BERRY asked for a "half", referring to a quantity of controlled substances.
- 30. On September 15, 2018, ODEN told BLOODWORTH that ODEN needs "one" for "45", referring to a kilogram of heroin/fentanyl for \$45,000.
- 31. On September 15, 2018, KIRKSEY, at ODEN's direction, delivered a kilogram of heroin/fentanyl obtained from BLOODWORTH to MURRELL. MURRELL subsequently told

ODEN that MURRELL's customer no longer wanted the heroin/fentanyl. KIRKSEY, and ODEN's direction, retrieved the kilogram of heroin/fentanyl from MURRELL and returned it to BLOODWORTH at 2183 Clara Street, Cincinnati, Ohio.

- 32. On September 15, 2018, PHILLIPS ordered controlled substances from ODEN.
- 33. On September 15, 2018 at approximately 12:24 p.m., another person told ODEN that he needs "four." At approximately 1:02 p.m, ODEN told JACKSON he needs JACKSON to meet him at the "clubhouse." At approximately 1:15 p.m., ODEN tells that other person that he's going to have JACKSON go to him [to deliver four ounces of controlled substances to that other person].
- 34. On September 16, 2018 at approximately 5:06 p.m., another person asked ODEN for one of them "golds". At approximately 8:26 p.m., ODEN told JACKSON to meet ODEN at the "clubhouse." At approximately 8:29 p.m., ODEN told that other person that "he" (JACKSON) is on his way to ODEN and that "he" (JACKSON) was coming [to deliver the controlled substances to the other person].
- 35. On September 17, 2018, when BLOODWORTH was arrested he possessed the phone that he used to communicate with ODEN, as well as the house keys to 569 Hoge Street, Cincinnati, Ohio.
- 36. On September 17, 2018, DIAZ-Gomez was arrested at 569 Hoge Street, a location from which approximately 1,002 grams of heroin/fentanyl mixtures was seized.
- 37. On September 17, 2018, at ODEN's residence, 605 Rushton Road, Cincinnati, Ohio, a kilogram press for narcotics was seized.
- 38. On September 17, 2018, ODEN was arrested at 1407 Beaverton Avenue, Cincinnati, Ohio, where there were located approximately 3,764 grams of methamphetamine mixtures, approximately 13 grams of cocaine mixture, and approximately 2,151 grams of various mixtures

containing fentanyl.

- 39. On September 17, 2018, when KIRKSEY was arrested at 2183 Clara Street, she possessed a firearm and suspected heroin.
- 40. On September 17, 2018, when MURRELL was arrested at 255 Earnshaw Avenue, he possessed a firearm.
- 41. On September 17, 2018, PHILLIPS possessed cutting agent (powdered sugar), press plates, masks, gloves and plastic packaging "tear-offs" (all for use in the illegal narcotics trade).

All in violation of 21 U.S.C. § 846.

## <u>COUNT TWO</u> (POSSESSION WITH INTENT TO DISTRIBUTE)

On or about September 17, 2018, at 1407 Beaverton Avenue, Cincinnati, Ohio, in the Southern District of Ohio, the defendants Charles Edward ODEN, aka "Charles Edward ODUM"; Anthony Tyrone PHILLIPS, aka "Tank"; Enya KIRKSEY; Jan C. MURRELL; Laquintee Deshon BLOODWORTH; Roderick Eric HENRY; Roy JACKSON, aka Unk"; Cesar DIAZ-Gomez; Carl BERRY; James CARTER; Gregory MOORE, aka "Gregory CAMPBELL"; Michael STALLWORTH and Savalas MILLS did unlawfully, knowingly, and intentionally possess with intent to distribute mixtures and substances containing 400 grams or more of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi) and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

# COUNT THREE (POSSESSION WITH INTENT TO DISTRIBUTE)

On or about September 17, 2018, at 1407 Beaverton Avenue, Cincinnati, Ohio, in the Southern District of Ohio, the defendants Charles Edward ODEN, aka "Charles Edward ODUM"; Anthony Tyrone PHILLIPS, aka "Tank"; Enya KIRKSEY; Jan C. MURRELL;

Laquintee Deshon BLOODWORTH; Roderick Eric HENRY; Roy JACKSON, aka :Unk"; Cesar DIAZ-Gomez; Carl BERRY; James CARTER; Gregory MOORE, aka "Gregory CAMPBELL"; Michael STALLWORTH and Savalas MILLS did unlawfully, knowingly, and intentionally possess with intent to distribute mixtures and substances containing 500 grams or more of Methamphetamine, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C. § 2 and <u>Pinkerton v. United States</u>, 328 U.S. 640 (1946).

## **COUNT FOUR**(POSSESSION WITH INTENT TO DISTRIBUTE)

On or about September 17, 2018, at 569 Hoge Street, Cincinnati, Ohio, in the Southern District of Ohio, the defendants Charles Edward ODEN, aka "Charles Edward ODUM"; Anthony Tyrone PHILLIPS, aka "Tank"; Enya KIRKSEY; Jan C. MURRELL; Laquintee Deshon BLOODWORTH; Roderick Eric HENRY; Roy JACKSON, aka :Unk"; Cesar DIAZ-Gomez; Carl BERRY; James CARTER; Gregory MOORE, aka "Gregory CAMPBELL"; Michael STALLWORTH and Savalas MILLS did unlawfully, knowingly, and intentionally possess with intent to distribute mixtures and substances containing 400 grams or more of Fentanyl, a Schedule II Controlled Substance

In violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi) and 18 U.S.C. § 2 and <u>Pinkerton v. United States</u>, 328 U.S. 640 (1946).

## COUNT FIVE (MAINTAINING A DRUG-INVOLVED PREMISES)

On or about September 13, 2018, and September 15, 2018, in the Southern District of Ohio, the defendants **Charles Edward ODEN**, **aka** "Charles Edward ODUM" and Enya KIRKSEY while managing and controlling premises at 2183 Clara Street, Cincinnati, Ohio, as occupants, knowingly and intentionally made available for use, with and without compensation said premises

for the purpose of unlawfully distributing or storing fentanyl, a Schedule II controlled substance, and heroin, a Schedule I controlled substance.

In violation of 21 U.S.C. §§ 856(a)(2) and 18 U.S.C. § 2.

## COUNT SIX (FELON IN POSSESSION OF A FIREARM)

On or about September 17, 2018, in the Southern District of Ohio, defendant **Enya KIRKSEY**, having been convicted of crimes punishable by imprisonment for a term exceeding one (1) year, to-wit: Possession of Heroin and Trafficking in Heroin, in case number B0806280, in the Hamilton County Court of Common Pleas, Hamilton County, Ohio, did knowingly possess at 2183 Clara Street, Cincinnati, Ohio, a firearm in and affecting commerce, to wit: a Kel-Tec, Model P3AT, .380 caliber, semi-automatic, serial number K5K88, which had been shipped or transported in interstate commerce, and 5 rounds of .380 caliber ammunition.

In violation of 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 924(a)(2) and 18 U.S.C. § 2.

# COUNT SEVEN (FELON IN POSSESSION OF A FIREARM)

On or about September 17, 2018, in the Southern District of Ohio, defendant **Jan C. MURRELL**, having been convicted of crimes punishable by imprisonment for a term exceeding one (1) year, to-wit: Aggravated Trafficking, in case number B9501159; and Drug Trafficking, in case number B9501159; and Having Weapons Under a Disability, in case number B1005109; and Receiving Stolen Property, in case number B8603322, and Weapon Under Disability, in case number B9502204; all in the Hamilton County Court of Common Pleas, Hamilton County, Ohio, did knowingly possess at 255 Earnshaw Avenue, Cincinnati, Ohio, a firearm in and affecting commerce, to wit: a Glock, Model 23, .40 caliber, semi-automatic, serial number DAY984, which had been shipped or transported in interstate commerce, and 20 rounds of .40 caliber ammunition,.

In violation of 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 924(a)(2) and 18 U.S.C. § 2.

## **FORFEITURE ALLEGATION 1**

Upon conviction of one or more of the offenses set forth in Counts One through Five of this Indictment, the defendants, Charles Edward ODEN, aka "Charles Edward ODUM"; Anthony Tyrone PHILLIPS, aka "Tank"; Enya KIRKSEY; Jan C. MURRELL; Laquintee Deshon BLOODWORTH; Roy JACKSON, aka :Unk"; Cesar DIAZ-Gomez; Carl BERRY; James CARTER; Gregory MOORE, aka "Gregory CAMPBELL"; Michael STALLWORTH and Savalas MILLS, shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s), and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s), including but not limited to the following:

- (1) \$89,845.00 in U.S. currency, seized from ODEN at the September 17, 2018, search warrant execution at 258 Earnshaw Avenue, Cincinnati, Ohio;
- (2) \$11,000.00 in U.S. currency seized from DIAZ-Gomez at the September 17, 2018 search warrant execution at 569 Hoge Street, Cincinnati, Ohio;
- (3) \$2,259.00 in U.S. currency, seized from DIAZ-Gomez on September 17, 2018;
- (4) \$6,022.00 in U.S. currency, seized from BLOODWORTH at the September 17, 2018 search warrant execution at 605 Rushton Road, Cincinnati, Ohio;
- (5) \$5,000.00 in U.S. currency seized from MURRELL at the September 17, 2018 search warrant execution at 255 Earnshaw Avenue, Cincinnati, Ohio;
- (6) \$9,041.00 in U.S. currency seized from MOORE on September 18, 2018;

- (7) 2011 Infiniti, Model: QY80 with VIN: JN8AZ2NE2B9003933 and Ohio license plate HGS2950 seized from Anthony PHILLIPS on September 17, 2018;
- (8) 2013 Hyundai, Model: Genesis with VIN: KMHGH4JH2DU070936 and Ohio license plate HIM6312 seized at the September 17, 2018 search warrant execution at 258 Earnshaw Avenue, Cincinnati, Ohio;
- (9) a Kel-Tec, Model P3AT, .380 caliber, semi-automatic firearm, serial number K5K88;
- (10) 5 rounds of .380 caliber ammunition;
- (11) a Glock, Model 23, .40 caliber, semi-automatic firearm, serial number DAY984; and
- (12) 20 rounds of .40 caliber ammunition.

### **FORFEITURE ALLEGATION 2**

Upon conviction of any of the offenses set forth in this Indictment, the defendants, **Enya KIRKSEY** and **Jan C. MURRELL**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such violation(s), including but not limited to, the firearms and ammunition listed in Forfeiture Allegation 1.

#### SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) or as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property

of said defendants, up to the value of the above forfeitable property.

A TRUE BILL.

GRAND JURY FOREPERSON

BENJAMIN C. GLASSMAN UNITED STATES ATTORNEY

KARL P. KADON

ASSISTANT UNITED STATES ATTORNEY

ORGANIZED CRIME DRUG ENFORCEMENT TASK FORCE